IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	Case No. 13-37200
	§	
GOLDKING HOLDINGS, LLC, *et al.*,[1]	§	
	§	Chapter 11
Debtors.	§	(Jointly Administered)
	§	
	§	

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	§	
GOLDKING ONSHORE OPERATING, LLC	§	
AND GOLDKING HOLDINGS, LLC,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Adv. Proc. No. 14-03144
	§	(Removed from the 61st Judicial
LEONARD C. TALLERINE, JR.,	§	District Court, Harris County, Texas)
GOLDKING ENERGY CORPORATION,	§	
GOLDKING ENERGY PARTNERS I, LP,	§	
GOLDKING ENERGY PARTNERS, II, LLC,	§	
GOLDKING CAPITAL	§	
MANAGEMENT, LLC, RETA	§	
WELLWOOD D/B/A	§	
VERMILLION CONTRACTING CO.,	§	
DENNA RAMSEY AND	§	
PAUL CULOTTA	§	
	§	
Defendants.	§	
	§	

NOTICE OF ADDENDUM TO NOTICE OF REMOVAL

PLEASE TAKE NOTICE THAT, plaintiffs and counterclaim defendants Goldking Onshore Operating, LLC and Goldking Holdings, LLC (the "Debtor Plaintiffs"), in their capacity

[1] The Debtors, together with the last four digits of each Debtor's federal tax identification number, are: Goldking Holdings, LLC (2614); Goldking Onshore Operating, LLC (2653); and Goldking Resources, LLC (2682). The mailing address for the Debtors is 777 Walker Street, Suite 2500, Houston, TX 77002.

as debtors and debtors in possession, hereby file this addendum attaching as exhibits each pleading as listed below filed in the state court proceeding:

INDEX TO
STATE COURT PLEADINGS

Exhibit No.	**Date**	**Description**
1.	02/13/2013	Plaintiff's Original Petition
2.	02/13/2013	Civil Case Information Sheet
3.	02/13/2013	Civil Process Request
4.	02/14/2013	Civil Bureau Process Pick-Up Form
5.	03/08/2013	Affidavit of Lost Return
6.	03/08/2013	Affidavit of Service
7.	03/21/2013	Plaintiff's Motion for Substitute Service Upon Denna Ramsey: Notice of Hearing; and Proposed Order
7-A	03/21/2013	Plaintiff's Motion for Substitute Service Upon Denna Ramsey – Proposed Order
7-B	03/21/2013	Plaintiff's Motion for Substitute Service Upon Denna Ramsey – Notice of Hearing
8.	03/26/2013	Defendants' Special Exceptions to Plaintiffs' Original Petition
9.	03/26/2013	Original Answer and Counterclaim
9-A	03/26/2013	Original Answer and Counterclaim – Exhibit A
9-B	03/26/2013	Original Answer and Counterclaim – Exhibit B
9-C	03/26/2013	Original Answer and Counterclaim – Exhibit C
9-D	03/26/2013	Original Answer and Counterclaim – Exhibit D
9-E	03/26/2013	Original Answer and Counterclaim – Exhibit E
10.	03/28/2013	Plaintiffs' Motion to Quash the Deposition of Edward Hebert
11.	04/01/2013	Civil Bureau Process Pick-Up Form

Exhibit No.	**Date**	**Description**
12.	04/18/2013	Plaintiffs’ Notice of Subpoena of Third-Party Documents to Regions Bank and Deposition on Written Questions; and Exhibits A – B
13.	04/25/2013	Plaintiffs' Notice of Subpoena of Third-Party Documents to Patrick McGarey; Exhibit ASubpoena for Production of Documents Pursuant to Texas Rules of Civil Procedure 176 and 205
13-A	04/25/2013	ASubpoena to Patrick McGarey for Production of Documents Pursuant to Texas Rules of Civil Procedure 176 and 205
14.	04/25/2013	Motion for Partial Summary Judgment on Right to Advancement; Exhibits A – E
14 - A	04/25/2013	Motion for Partial Summary Judgment on Right to Advancement – Proposed Order
14 - B	04/25/2013	Motion for Partial Summary Judgment on Right to Advancement – Notice of Hearing
15.	04/30/2013	Answer to Third-Party Plaintiffs' Petition and Request for Disclosure
16.	04/30/2013	Joint Motion to Compel Arbitration and for Stay of Counterclaim Causes of Action Nos 1-10; Exhibits 1 - 2;
16 - A	04/30/2013	Joint Motion to Compel Arbitration and for Stay of Counterclaim Causes of Action Nos 1-10 – Notice of Oral Hearing
16 – B	04/30/2013	Joint Motion to Compel Arbitration and for Stay of Counterclaim Causes of Action Nos 1-10 – Proposed Order
17.	05/01/2013	Hebert's Answer to Counterclaim Plaintiffs' Petition
18.	05/06/2013	Defendant Deena Ramsey's Original Answer - Filing Letter
18 - A	05/06/2013	Defendant Deena Ramsey's Original Answer
19.	05/09/2013	Response to Motion to Compel Arbitration
19 - A	05/09/2013	Response to Motion to Compel Arbitration – Affidavit of Leonard C. Tallerine, Jr.
19 - B	05/09/2013	Response to Motion to Compel Arbitration – Proposed Order
19 - C	05/09/2013	Response to Motion to Compel Arbitration – Exhibit A

Exhibit No.	**Date**	**Description**
19 - D	05/09/2013	Response to Motion to Compel Arbitration – Exhibit B
19 – E	05/09/2013	Response to Motion to Compel Arbitration – Exhibit C
19 - F	05/09/2013	Response to Motion to Compel Arbitration – Exhibit D
19 - G	05/09/2013	Response to Motion to Compel Arbitration – Exhibit E
19 – H	05/09/2013	Response to Motion to Compel Arbitration – Exhibit F
19 – I	05/09/2013	Response to Motion to Compel Arbitration – Exhibit G
19 – J	05/09/2013	Response to Motion to Compel Arbitration – Exhibit H
19 –K	05/09/2013	Response to Motion to Compel Arbitration – Exhibit I
19 –L	05/09/2013	Response to Motion to Compel Arbitration – Exhibit J
19 –M	05/09/2013	Response to Motion to Compel Arbitration – Exhibit K
19 – N	05/09/2013	Response to Motion to Compel Arbitration – Exhibit L
19 – O	05/09/2013	Response to Motion to Compel Arbitration – Exhibit M
19 – P	05/09/2013	Response to Motion to Compel Arbitration – Exhibit N
19 – Q	05/09/2013	Response to Motion to Compel Arbitration – FAX Cover Sheet
20.	05/13/2013	Order Signed Granting Arbitration and Motion to Stay Granted in Part
21.	05/14/2013	Docket Control/Pretrial Order Signed
22.	05/15/2013	Plaintiffs' Notice of Subpoena of Third Party Documents to Texas Community Bank and Deposition on Written Questions; and Exhibits A – B
23.	05/15/2013	Plaintiffs' Notice of Subpoena of Third Party Documents to Mutual of Omaha Bank and Deposition on Written Questions; and Exhibits A – B
24.	05/15/2013	Plaintiffs' Notice of Subpoena of Third Party Documents to Bank of River Oaks and Deposition on Written Questions; and Exhibits A – B
25.	05/15/2013	Plaintiffs' Notice of Subpoena of Third Party Documents to Comercia Bank and Deposition on Written Questions; and Exhibits A – B

Exhibit No.	**Date**	**Description**
26.	05/17/2013	Defendants' Original Answer
27.	05/24/2013	Plaintiffs' Goldking Onshore Operating LLC and Goldking Holdings LLC's Motion to Stay Advancement Claim Pending Appeal
27 - A	05/24/2013	Plaintiffs' Goldking Onshore Operating LLC and Goldking Holdings LLC's Motion to Stay Advancement Claim Pending Appeal – Notice of Hearing
27 - B	05/24/2013	Plaintiffs' Goldking Onshore Operating LLC and Goldking Holdings LLC's Motion to Stay Advancement Claim Pending Appeal – Proposed Order
28.	05/24/2013	Goldking Holdings LLC and Goldking Onshore Operating LLC's Response in Opposition to Motion for Partial Summary Judgment on Right to Advancement and Alternative Verified Motion for Continuance; Exhibits 1 - 10
28 - A	05/24/2013	Goldking Holdings LLC and Goldking Onshore Operating LLC's Response in Opposition to Motion for Partial Summary Judgment on Right to Advancement and Alternative Verified Motion for Continuance – Proposed Order
29.	05/28/2013	Culotta's Special Exceptions
29-A	05/28/2013	Culotta's Special Exceptions – Notice of Hearing
29-B	05/28/2013	Culotta's Special Exceptions – Proposed Order
30.	05/28/2013	Request for Findings of Fact and Conclusions of Law
31.	05/30/2013	Goldking Onshore Operating LLC and Goldking Holdings LLC's Notice of Accelerated Appeal
32.	05/31/2013	Plaintiffs' Response to Defendant Paul Culottas Special Exceptions
32 - A	05/31/2013	Plaintiffs' Response to Defendant Paul Culottas Special Exceptions – Proposed Order
33.	05/31/2013	Notice of Status Conference
34.	05/31/2013	Order Signed Staying Proceedings
35.	06/03/2013	Goldking Onshore Operating LLC and Goldking Holdings LLC's Request for Preparation of Clerks Record and Designation of Items to be

Exhibit No.	**Date**	**Description**
		Included Therein
36.	06/04/2013	Fourteenth court of appeals (correspondence to Court Reporter regarding record)
37.	06/05/2013	Fourteenth court of appeals (correspondence to Court Reporter regarding record) [duplicate of above]
38.	06/07/2013	Defendants/Counter-Plaintiffs' Cross-Notice of Accelerated Appeal
39.	06/14/2013	Defendant Tallerine's Motion for Protective Order; Exhibits A - B
39 – A	06/14/2013	Defendant Tallerine's Motion for Protective Order - Notice of Oral Hearing
40.	07/10/2013	Plaintiffs' and Third Party Defendants' Response to Tallerine's Motion for Protective Order
40 – A	07/10/2013	Plaintiffs' and Third Party Defendants' Response to Tallerine's Motion for Protective Order – Exhibit 1
40 - B	07/10/2013	Plaintiffs' and Third Party Defendants' Response to Tallerine's Motion for Protective Order – Exhibit 2
40 – C	07/10/2013	Plaintiffs' and Third Party Defendants' Response to Tallerine's Motion for Protective Order – Exhibit 3
40 – D	07/10/2013	Plaintiffs' and Third Party Defendants' Response to Tallerine's Motion for Protective Order – Exhibit 4
40 – E	07/10/2013	Plaintiffs' and Third Party Defendants' Response to Tallerine's Motion for Protective Order – Exhibit 5
40 – F	07/10/2013	Plaintiffs' and Third Party Defendants' Response to Tallerine's Motion for Protective Order – Exhibit 6
40 - G	07/10/2013	Plaintiffs' and Third Party Defendants' Response to Tallerine's Motion for Protective Order – Exhibit 7
40 - H	07/10/2013	Plaintiffs' and Third Party Defendants' Response to Tallerine's Motion for Protective Order – Exhibit 8
40 - I	07/10/2013	Plaintiffs' and Third Party Defendants' Response to Tallerine's Motion for Protective Order – Exhibit 9

Exhibit No.	**Date**	**Description**
40 - J	07/10/2013	Plaintiffs' and Third Party Defendants' Response to Tallerine's Motion for Protective Order – Exhibit 10
40 - K	07/10/2013	Plaintiffs' and Third Party Defendants' Response to Tallerine's Motion for Protective Order – Exhibit 11
40 - L	07/10/2013	Plaintiffs' and Third Party Defendants' Response to Tallerine's Motion for Protective Order – Exhibit 12
40 - M	07/10/2013	Plaintiffs' and Third Party Defendants' Response to Tallerine's Motion for Protective Order – Proposed Order
41.	07/11/2013	Proposed Agreed Protective Order
42.	07/12/2013	Agreed Protective Order (Civil) Signed
43.	07/16/2013	Rule 11 Agreement
44.	07/24/2013	Rule 203 Certification [Texas Community Bank]
45.	07/29/2013	Plaintiffs' Motion to Extend Stay of Advancement Claim Pending Appeal
45 – A	07/29/2013	Plaintiffs' Motion to Extend Stay of Advancement Claim Pending Appeal – Notice of Hearing
45 - B	07/29/2013	Plaintiffs' Motion to Extend Stay of Advancement Claim Pending Appeal – Proposed Order
46.	07/31/2013	Rule 203 Certification [Bank of River Oaks]
47.	08/01/2013	Defendants' Response to Motion to Extend Stay
47 - A	08/01/2013	Defendants' Response to Motion to Extend Stay - Proposed Order
47 - B	08/01/2013	Defendants' Response to Motion to Extend Stay FREEfax Cover Sheet
48.	08/02/2013	Notice of Status Conference
49.	08/02/2013	Signed Order Granting in Part Plaintiffs' Motion to Extend Stay of Advancement Claim Pending Appeal
50.	08/26/2013	Rule 11 Agreement (two signatures)
51.	08/28/2013	Rule 11 Agreement (duplicate of above with three signatures)

Exhibit No.	**Date**	**Description**
52.	09/09/2013	Plaintiffs' Original Petition in Intervention on Sworn Account and Requests for Disclosure; and Exhibits 1 – 2
53.	09/20/2013	Court Notice of Status Conference
54.	09/23/2013	Plaintiffs' Motion to Strike Louis Belanger's Plea in Intervention
54 - A	09/23/2013	Plaintiffs' Motion to Strike Louis Belanger's Plea in Intervention – Notice of Hearing
54 - B	09/23/2013	Plaintiffs' Motion to Strike Louis Belanger's Plea in Intervention – Proposed Order
55.	09/24/2013	Amended Notice of Hearing
56.	09/26/2013	Intervenor Louis Belanger Jrs.' Response to Plaintiff Goldking Onshore Operating LLC's Motion to Strike the Intervention; and FREEfax Cover Sheet
57.	09/26/2013	First Amended Answer and Counterclaim
58.	09/27/2013	Order Signed Striking Plea in Intervention
59.	10/04/2013	Rule 203 Certification [Texas Community Bank]
60.	10/04/2013	Rule 203 Certification [Dune Energy]
61.	10/24/2013	Plaintiffs' Motion to Strike Defendants Amended Pleading and in the Alternative Plaintiffs' Motion to Sever Belangers Claim
61 - A	10/24/2013	Plaintiffs' Motion to Strike Defendants Amended Pleading and in the Alternative Plaintiffs' Motion to Sever Belangers Claim – Notice of Hearing
61 - B	10/24/2013	Plaintiffs' Motion to Strike Defendants Amended Pleading and in the Alternative Plaintiffs' Motion to Sever Belangers Claim – Proposed Order
62.	10/25/2013	Court Notice of Reset of Oral Docket
63.	10/31/2013	Suggestion of Plaintiffs' Bankruptcy Petition and Motion to Stay Prosecution of Plaintiffs' Claims; and Exhibit A
64.	10/31/2013	Plaintiffs' Suggestion of Bankruptcy

Exhibit No.	**Date**	**Description**
65.	11/14/2013	Notice of Intention to Take Deposition by Written Questions to Keith Tunnell; and FREEfax Cover Sheet
66.	11/21/2013	Rule 203 Certification [Comerica Bank]
67.	11/21/2013	Rule 203 Certification [Whitney Bank]
68.	12/31/2013	Court Notice of Status Conference
69.	01/10/2014	Court Notice of Status Conference

Dated: May 1, 2014

Respectfully submitted,

HAYNES AND BOONE, LLP

/s/ Patrick L. Hughes

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this foregoing instrument (but not each exhibit attached hereto) was served on the [ ] day of April, 2014, as set forth below:

Via Email & Facsimile Eric Fryar Fryar Law Firm, P.C. 912 Prairie, Suite 100 Houston, Texas 77002-3145 Tel: (281) 715-6396 Fax: (281) 715-6397 **Attorney representing Defendants Leonard C. Tallerine, Jr., Goldking Energy Corporation, Goldking Energy Partners II, LLC, Goldking Capital Management, LLC, Reta Wellwood DBA Vermillion Contracting Co., and Paul Culotta**	***Via Email & Facsimile*** Craig Ribbeck The Ribbeck Law Firm 6363 Woodway, Suite 565 Houston, Texas 77057 Tel: (713) 621-5220 Fax: (713) 572-1507 **Attorney representing Defendant Denna Ramsey**
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/s/ Patrick L. Hughes
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